

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

3RED PARTNERS, LLC,)	
)	Case No. 20-cv-05064
Plaintiff,)	
)	
v.)	
)	Judge John Robert Blakey
MOHAMMADAMIN KHAJEHNEJAD,)	
)	
Defendant.)	

AGREED PERMANENT INJUNCTION

On August 27, 2020, 3Red Partners, LLC (“3Red”) filed its Verified Complaint [1] against Defendant M. Amin Khajehnejad (“Khajehnejad”) seeking injunctive and other relief. On September 1, 2020, 3Red filed its Motion for Temporary Restraining Order [10] and supporting Memorandum of Law [11] (collectively, the “Motion”). Defendant Khajehnejad filed an opposition to the Motion [17], 3Red filed a Reply [18], and Defendant filed a Sur-Reply [25]. The Court held a hearing on the Motion on September 10, 2020, and 3Red and Khajehnejad subsequently stipulated to the entry of a Temporary Restraining Order on September 22, 2020 [29]. The parties have now stipulated to entry of this Permanent Injunction Order.

Accordingly, and by stipulation of the Parties, the Court hereby ORDERS as follows:

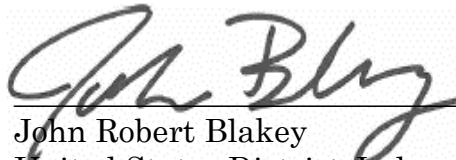
- (i) Khajehnejad, and any and all persons in active concert with him, are hereby enjoined from using any 3Red confidential information for their own benefit and from disclosing 3Red confidential information to anyone

not authorized to receive the information. For purposes of this order, 3Red confidential information includes non-public, proprietary knowledge, information, and property of 3Red that relates to the business, developments, activities or products of 3Red or the business affairs of any individual or firm doing business with 3Red, such as but not limited to, trading methodology, programming, statistical analysis, algorithmic development, individual trader performance, trading performance, trading positions, commission rates, products traded, vendor relationships and certain trading strategies (“3Red Confidential Information”);

- (ii) Khajehnejad, and any and all persons in active concert with him, are hereby enjoined from accessing or possessing 3Red Confidential Information;
- (iii) Nothing contained in this Agreed Order shall be deemed an admission of any liability or wrongdoing by Khajehnejad;
- (iv) This case is hereby terminated, although the Court shall retain jurisdiction to enforce the terms of this Permanent Injunction Order.

Dated: June 16, 2021

Entered:



John Robert Blakey
United States District Judge